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March 1, 1993

Mr. Ralph Haller  
Chief Private Radio Bureau  
Federal Communications Commission  
Washington, D.C. 20554

Subject: Docket 92-235  
Proposed FCC's Re-Farming of  
the Radio Frequency Spectrum  
from 72 MHz to 470 MHz

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As noted in the documents that Motorola has provided to Phelps Dodge Morenci Inc., the FCC intends to revise the VHF and UHF frequency bands into smaller divisions, lower the allowed modulation, and drastically lower the amount of power that can be radiated.

These changes will affect the Phelps Dodge Corporation in the following ways:

1. If the FCC does not allow Phelps Dodge to keep the frequencies it currently uses and relocates Phelps Dodge's frequencies to the new divisions, only the newest Motorola Maxtrac and Spectra Radios will be able to be used. All older equipment will be illegal. This will be viable until the second proposed changes go into effect. Then these radios will also be unable to comply with the specifications. The economic impact to Phelps Dodge Corporation would be in the millions of dollars to implement new R.F. systems.

#### Phelps Dodge Morenci Inc.'s Response

Current license holders should be "Grandfathered" to keep the assigned frequencies they currently use. The FCC should make provisions for location and terrain when deciding on limiting Effective Radiated Power (ERP) and Height Above Average Terrain (HAAT) restrictions.

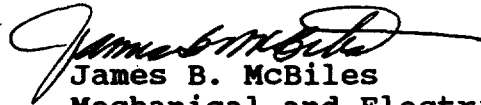
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Current Special Industry and Public Safety Rules should be maintained that allow higher antenna heights and higher ERP levels.

Thank you for your consideration in this matter.

Very truly yours,

  
James B. McBiles  
Mechanical and Electrical  
Superintendent

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